

programming it will offer under the LMA with Clear Channel. In addition, with the LMA Three Feathers will be better able to construct the necessary facilities and to equip the new station with the state-of-the-art technology authorized in the Commission's DTV proceeding. These improvements will facilitate the provision of additional and varied programming to the Wichita-Hutchinson Market.

Moreover, without the relationship between Three Feathers and Clear Channel, Three Feathers' application would still be frozen with three other mutually-exclusive applications that were filed for the new station on channel 36 at Hutchinson. As a result of its relationship with Clear Channel, Three Feathers was able to facilitate a settlement agreement with the three other mutually exclusive applications and make settlement payments to the other applicants. With Clear Channel's support, Three Feathers negotiated settlement agreements and is preparing to deliver to the Wichita-Hutchinson market an additional, competitive source of programming on broadcast spectrum that otherwise was unutilized.

The Three Feathers/Clear Channel LMA will improve the variety and quality of programming in the Wichita-Hutchinson market and has resulted in the resolution of four mutually exclusive applications and the issuance of a construction permit for a new television station that will serve the Wichita-Hutchinson market. Accordingly, the Wichita-Hutchinson market has benefitted and will continue to benefit from the LMA between Three Feathers and Clear Channel. Therefore, Three Feathers urges the Commission to grandfather the Three Feathers/Clear Channel LMA for its full and complete term, including renewal options.

Syracuse, NY

DMA Market No. 68

WSYT-TV, Ch. 68 (Fox)
WNYS-TV, Ch. 43 (UPN)

Prior to the Time Brokerage Agreement, station WNYS-TV was a full power licensee broadcasting at only 18,000 watts and having a very limited reach in the DMA. Under the Time Brokerage Agreement, WNYS-TV was rebuilt at a significant investment, increasing its power to 780,000 watts ERP and increasing its antenna height from its location on top of a 100 foot building to its collocation at 1,000 feet on WSYT's broadcast tower. Due to these improvements, WNYS improved its broadcast reach from approximately 45% of the population in the DMA to nearly 100%. Cable carriage was greatly enhanced and the station now reaches 97% of cable homes versus the 47% previously reached.

The Time Brokerage Agreement created a bonafide fifth station in the market and allowed WNYS to greatly improve its program offerings to the viewers in the Syracuse DMA. Brokering station WSYT also invested significant cash resources to provide better programming for the station including local sports and entertainment such as:

Syracuse University and Big East football and basketball (at a total cost in excess of \$250,000 per year).

Top notch syndicated fare including the three *Star Trek* franchises and *Grace Under Fire*.

It also enabled the station to better serve the community by:

- Increasing children's educational programming immediately from 30 minutes to 90 minutes weekly, and in the fall 1997 to an anticipated four hours weekly - all in post 8:00 a.m. time periods.
- Launching a locally produced public affairs show in March 1997 that airs in the prominent time period of 11:00 a.m. on Sundays.
- Becoming involved in community events - the station had done nothing in the past. In less than a year, WNYS has sponsored two National Kidney Foundation fundraisers, Coaches vs. Cancer, Syracuse Winterfest, a March of Dimes event, an ongoing school oriented recognition program called *Class Act*, and many more on-the-air and off-the-air initiatives.

The Time Brokerage Agreement created twenty (20) new jobs that did not exist because previously the station had been operating with a skeleton crew. The stations have achieved operating efficiencies in almost all areas by sharing facilities, personnel, and other resources.

The rebirth of this station also provides TV advertisers with an affordable alternative to the bigger and more expensive network affiliates of NBC, CBS, ABC, and FOX.

Syracuse, NY/Utica NY DMA Market Nos. 68 & 166

WIXT -TV, Ch. 9 (ABC) (Syracuse)
WUTR-TV, Ch. 20 (ABC) (Utica)

Technically, this LMA involves two separate markets. Upstate New York markets are depressed. This makes it difficult for television stations to provide quality local news

programming and remain competitive. This economic climate does not encourage investment in local news. It is in this area that the Utica LMA will soon provide demonstrable benefits to the Utica community. Anticipated cost savings from the LMA will enable CNY News to double its local morning news programming from fifteen minutes to a full half hour. This increase in local news programming demonstrates that agreements such as the Utica LMA serve the public interest.

Honolulu, HI DMA Market No. 69

KHNL-TV, Ch. 13 (NBC)
KFVE -TV, Ch. 5 (UPN)

Before entering into the current LMA arrangement, KFVE-TV was experiencing serious financial trouble and was failing in its efforts to attract advertisers and audience share. KFVE-TV faces particularly difficult market conditions, including high operating costs characteristic of Hawaii, an advertising market weakened by the sluggish Hawaiian economy, and formidable competition - eleven television stations, excluding satellite stations and LPTVs, and an 87% cable television penetration rate throughout Hawaii. The LMA has transformed KFVE-TV into a dynamic, thriving station, and has allowed KFVE-TV to develop substantially its local news, public affairs, sports, and entertainment programming.

For example, the KHNL-TV contract with the University of Hawaii Athletics Department was shifted to KFVE-TV, which now devotes 30% of its prime time programming to this local sports program and has made particular efforts to televise and promote women's sports. Under the LMA, KFVE-TV has been able to air locally produced information and entertainment programming, including a weekly local music program, an annual music awards show, and a daily 9:00 p.m. newscast -- the only prime time newscast in Hawaii.

The benefits of this LMA arrangement have been recognized by Senator Inouye in a speech on the floor of the United States Senate, where he remarked that this LMA "has made possible a significant increase in local programming, including an in-depth local news program at 9:00 p.m., extensive coverage of University of Hawaii's sporting events, weekly programs on Hawaiian culture and local issues, and a doubling of children's programming." 142 Cong. Rec. S706 (daily ed. February 1, 1996) (statement of Sen. Inouye).

Green Bay, WI

DMA Market No. 70

WGBA-TV, Ch. 26 (NBC)
WACY-TV, Ch. 32 (UPN)

The brokering station (formerly WLRE) has been the subject of two (2) bankruptcy reorganization proceedings - one commenced in the Eastern District of Wisconsin on January 29, 1985, which resulted in a bankruptcy approved sale of that station in late 1985, and a second commenced in the Middle District of Florida, Tampa Division, on April 7, 1989, with a bankruptcy approved sale of that station in 1991.

The brokered station was the subject of a bankruptcy reorganization and subsequent liquidation in the Northern District of Georgia, Atlanta Division, filed in 1991, with asset sale occurring in 1992. Following that sale, the brokered station went off air until June 2, 1994.

The LMA has rendered the brokered station viable. The LMA relationship has provided residents of Appleton, Wisconsin (the principal community served by the brokered station) with their only local television station and means of visual self expression. The LMA further provides program diversity to residents of the Appleton/Green Bay television market, and enables the brokered station to broadcast programming in the public interest which would otherwise not be available in the Appleton/Green Bay television market.

Spokane, WA

DMA Market No. 73

KREM-TV, Ch. 2 (CBS)
KSKN-TV, Ch. 22 (Ind)

The LMA will result in a number of efficiencies and public interest benefits. For example, once KSKN-TV's affiliation with the Home Shopping Club is terminated, the LMA will enable KSKN-TV to air additional local and public service programming, including additional weeknight newscasts at 10:00 p.m., which research and viewing patterns have demonstrated to be of great interest in the area; additional live, ongoing news coverage of

important events; additional informational and children's educational programming, such as *Oscar's Orchestra* and *Popular Mechanics for Kids*; additional public service announcements; and the opportunity to broadcast local high school, college, and semi-pro sports events. In general, the parties believe that KSKN-TV, under the LMA, will have a much broader demographic appeal as a full service station than it had before the LMA, as only a Home Shopping Club affiliate.

Furthermore, the LMA will enable KSKN-TV to make technical upgrades, which will increase the station's signal coverage and allow access to additional viewers and to additional cable system headends. These facility improvements, combined with the new programming and the switch to a new format, will allow expanded cable carriage of this local station. In addition, the LMA allows operational efficiencies, such as affording KSKN-TV access to experienced management and staff, and providing additional outlets for news, public affairs and local programming at limited additional costs. Finally, the LMA will provide an additional revenue stream from outside the market and generate local tax dollars for the community.

Omaha, NE

DMA Market No. 75

KPTM-TV, Ch. 42 (Fox/UPN)
KXVO-TV, Ch. 15 (WB)

Mid-America first applied for the construction permit for station KXVO on October 26, 1979. After protracted proceedings before the FCC, the construction permit was finally issued on December 19, 1988. In the nine years during which Mid-America's application was pending before the FCC, Mid-America's principal became involved in numerous other business ventures, and by the time the construction permit was granted, Mid-America appears to have been no longer willing nor able to commit the resources necessary to construct station KXVO. (See Exhibit 4 to Application on FCC Form 314 (File No. BAPCT900223KF) requesting the FCC's consent to the assignment of the construction permit for station KXVO from Mid-America to Pappas.)

While it is possible that another party might have commenced construction of the station, it is uncertain whether such a party would have been able to operate the station profitably on a standalone basis, given that station KXVO was the fifth commercial television station in the Omaha market, the nation's 75th Designated Market Area (DMA). Under the LMA with Pappas, however, station KXVO has been able to take advantage of numerous efficiencies made available to it as a result of the LMA. For example, stations KPTM and KXVO utilize space at the same

studio location and the antennas and transmitters for both stations are located at the same tower site. These efficiencies enabled station KXVO to operate profitably within six months of commencement of broadcasting. A standalone station would have taken much longer to become profitable, if it could have been profitably operated at all.

In addition, the programming of station KXVO by Pappas, and the station's connection with station KPTM, has enabled station KXVO to make available to the public political and other current events programming that would probably not be otherwise available.

Shreveport, LA

DMA Market No. 77

KMSS-TV, Ch. 33 (Fox)
KSHV-TV, Ch. 45 (UPN/WB)

While Communications Corporation of America is not itself the licensee of the stations, it is the ultimate parent company of Com. Corp. of Texas License Corp., which is the licensee of KMSS-TV (Shreveport, Louisiana.) CCA entered into Time Brokerage Agreements with White Knight Broadcasting of Shreveport License Corp. ("White Knight - Shreveport"), licensee of KSHV-TV. While the agreement was executed as of January 11, 1996, it has never actually been put into effect.

CCA is also a party to Commercial Inventory Agreements with White Knight-Shreveport. This agreement does not, however, involve the provision of any programming to the White Knight stations. Rather, the Commercial Inventory Agreements provide for CCA to sell commercial advertising time for and provide accounting and other office services to KSHV-TV in return for revenues from the advertising time sold.

The LMAs between CCA and White Knight were entered into to provide a backup position. At the time that the LMAs were entered into KSHV-TV was essentially a startup operation. Although White Knight Shreveport acquired a license for KSHV-TV, the station had not yet been on the air for even two years at the time that the LMA was executed. At the time that the LMA was entered into, White Knight-Shreveport fully intended to select, contract for, and air its own programming for KSHV-TV, and has in fact carried out this intention. Nevertheless, in light of the fact that the station was a startup operation, and in light of possible Commission rule changes which would prohibit future LMAs, White Knight-Shreveport determined that they would enter into LMAs to provide a fallback position in the event of future difficulties. White Knight-Shreveport continues to maintain the agreement with CCA as a fallback position.

Tucson, AZ

DMA Market No. 78

KMSB-TV, Ch. 11 (Fox)

KTTU-TV, Ch. 18 (UPN)

KTTU-TV had been experiencing serious financial difficulties prior to this LMA. The station almost "went dark" under its previous owner, the Catholic Diocese, and was losing money. The LMA has allowed the station to operate as a solvent and viable broadcast facility. Under the LMA, KTTU-TV has expanded its public affairs programming and has aired second runs of KMSB-TV public affairs programs, such as *13 and Pregnant* and *Stranger Danger*, allowing increased exposure to different audiences in different time periods.

KTTU-TV also has been able to partner with local nonprofit organizations to support community events and programs. KTTU-TV airs the popular University of Arizona football and basketball games, sport specials and coaches' shows. The LMA has allowed for more programming choices for viewers and UPN network expansion into the Tucson community. The local advertising community has benefitted under the LMA through lower advertising rates and greater commercial inventory on KTTU-TV. Finally, operational economies have allowed for investment in much needed capital improvements for both stations.

Paducah, KY

DMA Market No. 79

KSBI-TV, Ch. 23 (Fox)

WDKA-TV, Ch. 49 (UPN)

Prior to the time brokerage agreement, only a construction permit existed for WDKA-TV. Under the time brokerage agreement, WDKA was able to be built, at a significant investment including tower, transmitter and studio. Also, the time brokerage agreement with WDKA resulted in the hiring by the broker of 12 new employees, which in a medium sized market is a significant number in addition to the licensee's employees.

The station provides an important full time outlet to the new UPN Network which will help the new network grow and compete with the established networks. The station provides more children's educational programming to the market, as well as additional sports programming, such as St. Louis Cardinals' baseball games and college football and basketball games.

Providing a fifth station to the market allowed quality syndicated programming to again be seen in the market, such as the highly acclaimed *Cheers*, *Matlock*, and *Coach*. WDKA also provides another voice for significant public service announcements.

Portland, ME DMA Market No. 80

WPXT-TV, Ch. 51 (Fox)
WPME-TV, Ch. 35 (UPN)

Pegasus acquired the stock of the holding company of HMW, Inc., the licensee of WPXT-TV (Portland, Maine) in June of 1996. As part of a related transaction, Pegasus acquired the stock of BT Satellite, Inc. ("BT Satellite"), a company which was controlled by one of the former owners of HMW, Inc. BT Satellite had signed an LMA with New England Television, Inc., the permittee of an unbuilt television station, (now WPME) in Lewiston, Maine. Both stations will operate in the Portland, Maine DMA. That DMA is currently ranked number 80. These stations have overlapping city-grade contours. The Time Brokerage Agreement was originally entered into on the 29th day of January 1996. Pegasus acquired the stock of the company holding the LMA on June 20, 1996.

WPXT is a Fox Affiliate. WPME is not yet on the air. It is anticipated that WPME will be a UPN Affiliate. As WPME is not yet on the air, it has no audience share.

The LMA advances the public interest both by encouraging the construction of WPME, a station which might otherwise not provide a significant programming source for the Portland market, and by strengthening WPXT, a lone and young UHF station in a market with three dominant and far older VHF stations.

In a smaller market such as Portland, dominated by three VHF affiliates, WPME would not make an attractive investment opportunity for an independent operator, and whether that station could ever be operated as a standalone facility is questionable. However, teamed with the Pegasus station, programming and cost saving opportunities will be presented which will allow for the development of a station which can serve the community's needs and interests.

Ft. Myers-Naples, FL DMA Market No. 83

WBBH-TV Ch. 20 (NBC)
WZVN-TV, Ch. 26 (ABC)

The stations entered into a time brokerage agreement in June 1994. At the time of the agreement, WZVN was essentially non-competitive in the marketplace. It had an outdated physical plant and a bare bones sales staff. This financially distressed station was simply unable to produce and broadcast any significant news or public affairs programs. There has been a marked financial improvement in the station since entering into the LMA.

The time brokerage agreement has increased program diversity in the market. There has been a significant improvement of WZVN since entering into the local marketing agreement. The station now broadcasts from a new state of the art studio, broadcasting its ABC network programming as well as non-duplicated syndicated and local programming with a WZVN news staff which is fully competitive in the marketplace. WZVN provides an exclusive daily half-hour newscast at 7:00 p.m. The two stations now utilize three AMS meteorologists and three additional weather forecasters, providing the market with comprehensive weather service in one of the major hurricane areas in the nation. Each station broadcasts its own newscasts with separate meteorologists, dual anchors, a sports anchor and a producer. News data differs substantially on each station. Specific reporters and producers are assigned to each station, with a majority of the support staff shared by both stations.

Each station engages in its own public affairs and public service programming. WZVN is currently working on two projects. In conjunction with ABC's "March Against Drugs", the station is engaged in a month long effort to encourage parents to take the time to talk to their children about drugs. The second project is a daylong festival called *Kids Fest*. *Kids Fest* will be held at a local convention center and is designed to introduce children and parents to local community organizations that concentrate on positive activities for families. WBBH is conducting its eighth annual *A-Team High School Academic Challenge*. A total of 18 half-hour academic contests among area high schools are produced and broadcasted by the station. The A-Team challenge culminates in an hour long final game which is telecast in prime time.

As a result of the local marketing agreement, the stations were able to invest (\$400,000) in the new and strongest Doppler Radar in the market, an investment neither station could have made individually, Doppler Radar is a vital piece of equipment, given the frequent severe weather in South Florida. A new \$180,000 digital routing system was purchased, rather than buying two smaller systems at an increased price. Now both stations are capable of routing digital signals in preparation for HDTV. Because of the LMA, WZVN is now able to provide

live remote coverage of local stories. WZVN is able to benefit from a new ENG vehicle dedicated for the station's use. The station also has access to a satellite news truck or "SNG" (Cost for vehicles \$675,000). The local marketing agreement has also led to a \$2.5 million dollar investment in a new digital studio and control room, giving WZVN the most advanced broadcast studio in the market. The studio was built exclusively for WZVN and adjoins the WBBH facility. Finally, the local marketing agreement has increased the total employment of the two stations from 138 to 190 - a 38% increase. With respect to the news departments, the total news complement of the two stations has increased from 66 to 80 full time employees, a 20% increase.

Cedar Rapids-Dubuque, IA

DMA Market No. 86

KFXA, Ch. 28 (Fox)

KFXB, Ch. 40 (Fox)

KFXB (formerly KDUB) Channel 40 (Dubuque, Iowa) operates in the Cedar Rapids-Waterloo-Dubuque LMA. KFXB operates at 537,000 watts visual and 53,700 watts aural at an antenna height of 841 feet above average terrain.

The station originally signed on the air as an ABC affiliate in 1970 as KDUB. The station ceased operations due to financial failure in 1973. Under new ownership KFXB (KDUB) returned to the air in 1975.. KDUB continued to operate as a second ABC affiliated in the Cedar Rapids-Waterloo-Dubuque television market. With limited power and antenna height, KDUB was unable to put an over-the-air signal over major portions of the market. The signal did not reach the population centers of Cedar Rapids, Waterloo or Iowa City. KDUB's cable network non-duplication protection ended by FCC order in 1988, allowing all of the duplicated ABC programming from KCRG (the other ABC affiliate in the market) to be available on the TCI cable system serving Dubuque and other communities in Dubuque County. Approximately 94% of the homes in Dubuque were connected to TCI cable. In the meantime, KCRG (Ch. 9), KGAN (Ch. 2), the CBS affiliate, and KWWL (Ch. 7), the NBC affiliate, were all able to cover, with an over the air signal, the entire 21 counties in the LMA, including Dubuque and Dubuque County. In a 30 million dollar plus television market where three competing VHF stations were billing between eight and 12 million dollars each, KDUB was never able to bill more than 1.5 million. National advertising on KDUB was almost nonexistent, reaching only 1.5% of the total market. Network compensation was less than \$40,000 per year. Approximately 98% of KDUB's revenue was local direct and regional. Limited revenue, due to lack of power and antenna height, and the fact that KDUB was a duplicate network service, severely limited the potential for KDUB to grow and in fact threatened its very survival. KDUB could not compete in the market for syndicated programs due to the price of programming, and prime time network Nielsen rating numbers continued to be eaten away by KCRG. The future of KDUB was in trouble.

The station became aware of Second Generation of Iowa and their effort to purchase KOCR (now KFXA), the former Fox affiliate in Cedar Rapids. Discussions were held about the possibility of combining the signal of KOCR and KDUB in order to cover the entire Cedar Rapids-Waterloo-Dubuque market, and to provide the first Fox network programming in Dubuque, Dubuque County, and the rest of the Cedar Rapids-Waterloo-Dubuque market.

An LMA agreement was negotiated. The combined operation began on August 13, 1995. The LMA assured the survival of KFXB (formerly KDUB) and improved the quality of service to viewers in Dubuque and Dubuque County, as well as Grant County in Wisconsin, and Jo Daviees County in Illinois.

Under the LMA agreement, Second Generation of Iowa replaced inadequate technical equipment at KFXB including the STL microwave, Dyplexer, and transmitter parts and equipment. The KFXB tower was reinforced and repaired. The KFXB news department was provided with new equipment such as a new news set, new field cameras and related equipment. The weather department was completely rebuilt and new state of the art Accu-Weather computer equipment was installed. The KFXB studio received new cameras and additional lighting equipment. New tape recording and playback equipment was installed in the control room.

With Fox network programming, improved technical quality, and a better equipped and staffed news operation, KFXB was able to join our sister station KFXA in Cedar Rapids to become the Fox affiliate for the 86th LMA market, and become one of the fastest growing television stations in the United States. The LMA agreement not only insured that Dubuque's only television station would remain in business, but enables the station to better serve its viewers with quality children's educational programs that exceed the FCC required three hours per week, entertainment, and sports programming from the Fox network that not previously available to viewers, top quality first run and off-network syndicated programs, and improved news programs.

The May 1997 Nielsen audience survey for the four counties that KFXB serves (Dubuque and Jackson in Iowa, Jo Daviees in Illinois, and Grant in Wisconsin) showed that the station's new 5-6:30 p.m. M-F audience grew by an additional 63% after showing a 60% gain from November 1996 to February 1997. The station's 10-10:30 p.m. M-F news was the number one news program in both overall households and adults 35 and older.

All of this is directly related to better personnel, better equipment and better promotion made possible by the LMA. The technical quality of KFXB has improved dramatically. The program quality has improved. The news program quality has improved. None of this would have been possible without the LMA agreement with Second Generation of Iowa. In fact, if a viable FOX affiliate had come into the market and KFXB had not been part of it, the additional competition for programming and revenue would have insured the failure of KFXB. There would be no television station in Dubuque today. The LMA agreement saved a television station and made it better able to serve its community.

Johnstown-Altoona, PA

DMA Market No. 92

WWCP-TV, Ch. 8 (Fox)

WATM-TV, Ch. 23 (ABC)

It is extremely important that the Commission grandfather the WATM-TV LMA. Fundamental fairness dictates this, as well as the efficiencies and public interest benefits flowing from the ownership of WWCP-TV and the programming of WATM-TV. See the showings made by US Broadcast Group in connection with its pending application FCC File No. BALCT-95082IKK to acquire WATM-TV.

Waco, TX

DMA Market No. 94

KWKT-TV, Ch. 44 (Fox)

KAKW-TV, Ch 62 (UPN/WB)

While Communications Corporation of America (CCA) is not itself the licensee of stations in either of those markets, it is the ultimate parent company of Com. Corp. of Texas License Corp., which is the licensee of KWKT-TV (Waco, Texas.)

CCA entered into Time Brokerage Agreements (TBAs) with White Knight Broadcasting of Killeen License Corp. ("White Knight-Killeen"), licensee of KAKW-TV. While the agreement was executed January 11, 1996, it has never actually been put into effect.

CCA is also a party to Commercial Inventory Agreements with White Knight-Killeen. These agreements do not, however, involve the provision of any programming to the White Knight stations. Rather, the Commercial Inventory Agreements provide for CCA to sell commercial advertising time for and provide accounting and other office services to KAKW-TV in return for revenues from the advertising time sold.

The LMAs between CCA and White Knight were entered into to provide White Knight-Killeen a backup position. At the time that the LMAs were entered into, KAKW-TV was essentially a startup operation. Indeed, White Knight-Killeen had just acquired the construction permit for KAKW-TV, and the station did not commence regular broadcast operations until May 31, 1996. At the time that the LMAs were entered into, White Knight-Killeen fully intended to select, contract for, and air its own programming for KAKW-TV, and they have in fact carried

out this intention. Nevertheless, in light of the fact that the station was a startup operation, and in light of possible Commission rule changes which would prohibit future LMAs, White Knight-Killeen determined that it would enter into the LMAs to provide a fallback position in the event of failure. White Knight-Killeen continues to maintain the agreement with CCA as a fallback position.

Lincoln - Hastings - Kearney, NE

DMA Market No. 101

KHGI -TV, Ch. 13 (ABC), (Kearney)
KWNB-TV, Ch. 6 (ABC), (Hayes Center)
KSNB -TV, Ch. 4 (Fox), (Superior)
KTVG-TV, Ch. 17 (Fox), (Grand Island)

While these stations are located in the same DMA, it is a hyphenated market covering a vast geographic area. For example, KWNB is licensed to Hayes Center, which is over 90 miles from Kearney, which is KHGI's community of license. Thus, while the stations may be found in the same DMA, they serve widely dispersed local communities and markets.

Fant Broadcasting Company of Nebraska, Inc. (Fant) and Pappas Telecasting of Central Nebraska are parties to a Time Brokerage Agreement dated as of July 1, 1997, pursuant to which Pappas acts as time broker for KHGI-TV (Kearney, NE), KWNB-TV (Hayes Center, NE) and KSNB-TV (Superior, NE). On July 1, 1997, Pappas also acquired and assumed Fant's rights and obligations as time broker under a Time Brokerage Agreement dated as of April 1, 1994 between Fant and Hill Broadcasting Company with respect to KTVG-TV, which serves Grand Island, NE. Consequently, since July 1, 1997, Pappas has acted as time broker for the abovementioned stations.

Today KHGI and KWNB are affiliates of the American Broadcasting Companies, Inc. ("ABC") television network. Prior to September 1996, KSNB was an ABC affiliate. KTVG-TV was, and is, an affiliate of the Fox Broadcasting Company ("Fox") television network. In September 1996, Fant, in consultation with Pappas, changed the affiliation of KSNB-TV from ABC to Fox. Whereas KTVGTV, which has very limited coverage, was the only Fox affiliate in the Lincoln-Hastings-Kearney, Nebraska Designated Market Area (DMA) prior to September 1996, the DMA now has two Fox affiliates: KTVG-TV and KSNB-TV. Moreover, through a combination of the change of KSNB-TV's affiliation to Fox and the fact that the KTVG-TV and KSNB-TV signals are provided to Cable USA (one of the largest cable television system operators in Central Nebraska), the audience reach of KTVG-TV/KSNB-TV has been extended approximately fivefold over the reach of KTVG-TV when it was the sole Fox affiliate in the

DMA. The result is that many more people now have access to Fox programming, including the Fox Children's Network, which is recognized as a leader in providing informational and educational children's programming.

In addition, since Pappas has been providing programming to KTVG-TV in Pappas's role as time broker, Pappas has substantially increased the amount of news carried on the station. Whereas prior to Pappas's involvement the amount of news carried on KTVG-TV was minimal, KTVG-TV now carries the same news programming as the other stations; *i.e.*, half-hour broadcasts at 6:30 a.m., 12:00 noon, 6:00 p.m., and 10:00 p.m.

Fant, Hill, and Pappas also intend to make improvements to the transmitting facilities of KHGI-TV and KTVG-TV that will significantly enhance those stations' abilities to serve the public. The Federal Aviation Administration has granted the permit to construct a 1,919 foot high tower in Ravenna, Nebraska, on which the KHGI-TV and KTVG-TV antennas will be mounted. We are awaiting FCC approval. Relocation of the stations' facilities to that tower will enable them to reach a far larger audience, particularly with KTVG-TV, which has historically had a very small reach with its over the air transmissions..

Fant and Pappas also entered into an Asset Acquisition Agreement dated as of July 1, 1997, pursuant to which Pappas agreed to purchase three stations from Fant - KHGI-TV (Kearney, NE) , KWNB-TV (Hayes Center, NE) and KSNB-TV. (Superior, NE). Pappas rights under the agreement to purchase KSNB-TV were subsequently assigned to Colins Broadcasting Co. Colins and Pappas are parties to a Time Brokerage Agreement dated as of November 4, 1997, pursuant to which Pappas has agreed to act as time broker with respect to station KSNB-TV (Superior, Nebraska) following Colins' acquisition of such station. Colins' application is currently pending before the FCC (File No. BALCT-9701281A), as amended, requesting the FCC's consent to the assignment of the FCC license for station KSNB from its current holder, Fant Broadcasting Company of Nebraska, Inc., to Colins. Also pending before the FCC is an assignment application by Fant to Pappas for stations KHGI and KWNB.

Apart from the clear public interest benefits mentioned above, the LMA with Colins demonstrates an additional benefit of LMAs - increasing diversity by providing a greater opportunity to obtain financing and to become involved in other broadcast ventures in the future should Colins choose to do so.

Greenville, NC

DMA Market No. 105

WXFI-TV, Ch. 8 (Fox)
WYDO-TV, Ch. 14 (Fox)

WYDO -TV was put on the air in July 1992 by KS Family Television, Inc. and operated independently for several months until the programming agreement with Local Television Associates, Inc. was entered into on November 3, 1992. The benefits to the public that have been associated with brokering of time on WYDO-TV by WFXI-TV have been described in BALCT-9605231B. Those same benefits will be realized and extended upon grant of the license of WYDO-TV to GOCOM as described further in the pending application.

Tyler, TX

DMA Market No. 108

KETK-TV, Ch. 19 (NBC)
KLSB-TV, Ch. 56 (NBC)

The time brokerage agreement currently enjoyed by KLSB-TV has given the station the financial ability to continue its service to Nacogdoches, Texas, in much the same form as its previous operation as a satellite to, and under common ownership with KETK, (Jacksonville.) In addition to the program offerings, the TBA results in a continuation of the staffing by 16 fulltime and two part time employees of the broker, in addition to KLSB's General Manager and Chief Engineer, employees of the licensee.

KLSB airs Public Service Announcements geared to the Nacogdoches community and popular programs not aired by KETK, including *Cosby*, *Strange Universe*, *Coach*, *Court TV*, and a different feed of *NBC News Sunrise*.

Future benefits that may result from the TBA include a news broadcast covering the Nacogdoches community which would originate from the KLSB studios. Such a broadcast is currently under examination for its financial and technical feasibility.

Also planned is an increase in the operating power of KLSB, which will broadly expand coverage to the Nacogdoches community. An FAA determination of No Hazard of the tower for this project was received June 12, 1997. Without the TBA, the anticipated improvements to the KLSB transmission facility would not be possible.

Tallahassee, FL DMA Market No. 114

WTLH-TV, Ch. 49 (Fox)

WFXU-TV, Ch. 57 (Unbuilt/Fox)

While located in the same DMA, the stations serve different communities. WTLH-TV serves Bainbridge, Georgia, and WFXU-TV serves Live Oak, Florida. A Pegasus subsidiary, WTLH Inc., is the licensee of WTLH-TV (Channel 49) Bainbridge, Georgia. L.O. Telecast, LLC, is the permittee of unbuilt television station WFXU-TV (Live Oak, Florida.) WFXU-TV will operate on Channel 57. The stations have overlapping predicted Grade B contours. The LMA was executed on June 18, 1997, by Telecast of Florida, Inc., which is now a wholly owned subsidiary of Pegasus.

The LMA has a term of five years from the commencement of operations of WFXU pursuant to program test authority. The agreement automatically renews for an additional period of five years unless terminated by the broker 180 days prior to the expiration of the initial term. The agreement provides the broker with the right to program up to 166 hours per week, subject to preemption by the licensee for programming, which it believes better serves the public interest.

WTLH is currently a Fox Affiliate. It is currently assumed that the brokered station will provide Fox programming as well. As set forth below, the two stations complement each other, fully covering the entire Tallahassee DMA, which neither alone can provide.

WFXU has not yet been constructed. The areas served by this station, while in the Tallahassee DMA, will cover areas of north central Florida and southern Georgia which, due to their distance from Tallahassee and relatively small proportion of the DMA population, currently receive few over-the-air television stations. Because WTLH is licensed to Bainbridge, Georgia, northwest of Tallahassee, and WFXU is licensed to Live Oak, east of Tallahassee, the two stations complement each other in providing full service to this geographically large DMA.

The Live Oak permit has been outstanding since 1987 due to various problems the licensee has encountered in completing construction. The population served within the WFXU-TV Grade B contour is only 200,000. The financial return for constructing a station in such a sparsely populated area is not great. By combining with WTLH, and relying on WTLH for the bulk of its programming, the combined stations can provide full market coverage to the entire Tallahassee DMA. Thus, WFXU can economically be activated to provide service to the residents within its coverage area, many of whom receive very little over-the-air television reception. Given its tortured history and limited service area, it is questionable whether WFXU could ever be a full service, standalone station.

This LMA clearly serves the public interest by activating this new channel. Moreover, no threat to competition is posed by this agreement. The current market share of WTLH is only 5%. This contrasts with the market share of the dominant VHF station in the market, WCTV, which commands a huge share of the Tallahassee Market.

Clearly, even with the Live Oak station, no threat to marketplace competition can arise from the WFXU/WTLH combination. If anything, this combination will allow WTLH to become a more viable competitor in the Tallahassee market, and will allow for the initiation of service to the residents of the Live Oak area, a service which might not otherwise be economically feasible.

Florence - Myrtle Beach, SC DMA Market No. 116

WPDE-TV, Ch. 15 (ABC)
WWMB-TV, Ch. 21 (UPN)

The TBA between WPDE and WWMB is a precise example of why the Commission should permit LMAs to continue. The Florence-Myrtle Beach market has been underserved by local television stations since the creation of the medium. In the past, the residents had to rely on television coverage from stations located more than one hundred miles away. Charleston, South Carolina, Columbia, South Carolina, and Wilmington, North Carolina all provided some level of over-the-air signals to the Florence-Myrtle Beach market, but provided no local news, public service, or community involvement.

WBTW-TV, a CBS affiliate, was the only station serving the market from the 1950s until 1980, when WPDE signed on the air. Initially, the size of the market barely supported the two stations. However, both WBTW and WPDE invested heavily in the market and their products by offering local news, public service, and programming. This allowed the market to mature into a solid two station market. However, the market revenue was not large enough for Atlantic to secure financing to build a third station (i.e., WWMB). Atlantic worked diligently for six years to construct WWMB, and was at one time faced with the prospect of losing the WWMB construction permit for failure to construct.

The TBA with WPDE enabled Atlantic to eventually to construct WWMB, launch a 10:00 p.m. prime time newscast, and begin serving the community. Since 1994, WWMB has been the major sponsor for many annual fundraisers. One example is the highly successful fundraiser for the Conway Hospital Foundation. WWMB's efforts and support helped raise more than \$250,000 for the hospital, which was used to purchase a specially designed mobile health

unit. The mobile unit is currently providing health care to some of the thousands of rural families in the Florence-Myrtle Beach market that cannot afford annual medical checkups, prenatal care, and other basic health care.

WWMB is also the sponsor of the Senior Life Style Expo, an event targeted at helping inform the area's large senior population of the many senior related social services offered in the Florence-Myrtle Beach market, and how to obtain the services.

WWMB has committed more than \$250,000 of air time to other community events and public service programs. If LMAs were not allowed, WWMB would not have had the opportunity to provide these services to the market.

Reno, NV

DMA Market No. 119

KRXI -TV, Ch. 11 (Fox)

KAME-TV, Ch. 21 (UPN)

At the same time that KTVU (Ch. 2, San Francisco) commenced its "out of market" time brokerage arrangement with KAME-TV, it entered into a Management Services Agreement with Nevada Television Corporation ("NTC"), a minority controlled company, pursuant to which KTVU agreed to assist NTC in constructing the station, and in programming the station upon construction. NTC had obtained the construction permit through a comparative hearing in 1991 but had not yet completed construction in 1995 when it entered into the Management Services Agreement with KTVU. KTVU provided technical and operational assistance in the construction of KRXI-TV over the next several months and assisted KRXI-TV in affiliating with the FOX network. KTVU's assistance to KRXI was crucial to ensuring that the station commenced operations promptly with a strong programming format. Due in part to KTVU's efforts, the relatively small Reno market now enjoys a new VHF signal that not only provides superior coverage of Reno but also provides service to certain gray areas in the market. In December 1996, KTVU exercised its option to purchase the stock of NTC and closed on this acquisition in June 1997.

KTVU's time brokerage arrangement with KAME-TV has had equally important public interest benefits. Prior to the TBA, KAME-TV aired minimal public affairs programming, had limited involvement with the local community and did not carry any news programming. Under the TBA, however, KAME-TV has enhanced its efforts in all three areas. The station airs an ongoing public service campaign, *Me and the Community*, which consists of a series of PSAs covering topics such as health care, the dangers of drug use, fire safety, the Humane Society, and local Boy and Girl Scouts troops and activities. KAME-TV and KRXI-TV have also participated

in over 50 charitable events including "Pops by the River," events sponsored by the University of Nevada, Humane Society events, the Muscular Dystrophy Telethon, the Nevada Opera and events sponsored by the Auto Museum. In short, the LMA has produced the following public interest benefits:

- *New and more reliable equipment which has enhanced signal delivery.
- *An increase in the number and quality of trained personnel in all departments.
- *Increased number and quality of syndicated shows, movies and educational programs.
- *Higher quality Public Service Announcements (PSAs).
- *A locally produced issues and problems program.
- *Involvement with the community in raising the profile of the arts, as well as raising cultural awareness.
- *Hosted the most successful MDA and Humane Society telethons through innovative programming techniques and strategies.

KAME-TV also now rebroadcasts the hour long daily newscast produced by KTVU and aired on Television Station KTVU-TV in Oakland, California. This newscast covers issues of regional and national concern that are of importance to the Reno, Nevada area. KAME-TV and KRXI-TV are now working together to investigate the prospects of initiating a locally produced newscast, a project neither station could undertake on its own absent the TBA.

In summary, KTVU's time brokerage arrangements with KAME-TV and KRXI-TV have produced substantial public interest benefits, the most significant of which are increased programming diversity and public service to the Reno community.

Monterey /Salinas, CA

DMA Market No. 122

KCBA-TV, Ch. 35 (Fox)
KION -TV, Ch. 46 (CBS)

But for the LMA between Harron and AK Media, the residents of Monterey and its surrounding areas would have been deprived of one of five sources of local television programming. By the time Harron and AK Media entered into the LMA in April 1996, Harron and KION were in dire financial straits. In 1994, Harron operated KION at a net loss of \$4,307,969. In 1995, KION had a net operating loss of \$3,145,575. In the first three months of 1996, KION lost an additional \$924,362. By the winter of 1995-96, KION's condition had become so precarious that Harron was unable to pay its program suppliers, who were refusing to provide additional products to the station and had begun to file lawsuits to collect amounts owed. Harron had exhausted its financial resources and had no additional funds to invest in the station. As a result, Harron was considering seeking bankruptcy protection and suspending operation of KION. Without the LMA, Harron would have been forced to cease KION's operations completely.

The Monterey LMA provided immediate benefits to KION and its viewers. First, it enabled AK Media to guarantee a bank loan to Harron, which, in turn, enabled Harron to pay off outstanding obligations that were squeezing the station's scant resources. Once the LMA was in place, Harron authorized AK Media to make technical improvements at KION that have provided measurable benefits to the viewing public. KION's over-the-air signal was enhanced first. The subsequent purchase and installation of a new Optimod boosted the station's audio levels. Finally, the LMA allowed AK Media to provide closed captioning capability to KION. Consequently, KION, once a failing station operating on outmoded facilities, now has the ability to broadcast in full stereo sound, has improved its audio levels by 5-6 dB, and provides closed captioning to its viewers.

Perhaps the most important contribution of the Monterey LMA, however, lies in the continuing effort to foster and maintain diversity and competition in news programming in the Monterey-Salinas LMA. Of the five stations serving the MA, one station, KSBW-TV, a NBC affiliate, has dominated news programming for at least a decade. In the five year period from 1991 through 1996, KSBW's percentage of total Monday through Friday news viewers (*i.e.*, viewers of both local and national news) never dropped below 50%. A comparison of KSBW's total audience share with that of KCBA and KION demonstrates KSBW's continued dominance of the Monterey-Salinas DMA.

Period	KCBA	KION	KSBW
May, 1997	6.8	9.1	21.3
February, 1997	7.5	10.0	23.3
November, 1996	7.5	9.2	21.8

Since entering into the LMA, AK Media and Harron have increased KION's local news programming by two hours and forty-eight minutes per day. This programming is *in addition to* the CBS network news that KION was already broadcasting prior to the LMA. KION is now broadcasting four hours and eighteen minutes of news each weekday--a full two hours and forty-eight minutes more local news with the LMA than without it. The net result of this increase, made possible by the LMA, has been to make KION's news programming more competitive with KSBW.

The increase in total news programming and coverage provided by KION, the technical improvements to KION's facilities and, indeed, the fact that KION remains on the air as an independent voice in the Monterey-Salinas LMA are substantial evidence that the LMA entered into by AK Media and Harron is in the public interest. These efforts have not gone unnoticed by the community.

Columbus, MS

DMA Market No. 129

WTVA-TV, Ch. 9 (NBC)
WLOV-TV, Ch. 27 (FOX)

The history behind the "Program Services Agreement" pursuant to which WTVA and WLOV-TV operate is significant. Without the agreement, WLOV-TV likely would have ceased operations several years ago, and without its continuance, it likely would do so at this time. Indeed, absent the "Program Services Agreement," LBC would not have acquired WLOV-TV. The history of WLOV-TV's financial difficulties is a matter of Commission record. Nonetheless, certain factual information bears repetition at this time. Prior to the assignment of license to LBC, Love Communications Company ("Love"), the previous licensee, was having considerable financial difficulties traceable to WLOV-TV. As previously reported to the Commission, WLOV-TV was producing operating losses in excess of \$300,000 in 1991, and nearly \$500,000 per year by the end of 1992. So desperate was the prior licensee over the financial condition of WLOV-TV that it conceived the idea and suggested to WTVA, Inc., that the two stations enter a "Program Services Agreement." The resulting agreement was executed on May 8, 1992.

Effective October 6, 1995, LBC switched its network affiliation to Fox Broadcasting Company. LBC, as the licensee of WLOV-TV, not WTVA, Inc., is the signatory to the Fox Broadcasting Company affiliation agreement.

Similar financial information was reported to the Commission by Love in 1992 in connection with its application for authority to collocate its main studio with that of WTVA. The station struggled for its very existence as the only UHF station in the Columbus-Tupelo market, competing with four VHF stations (two commercial and two noncommercial). In authorizing the main studio move, the Commission, fully aware of the existence of the "Program Services Agreement," acknowledged that WLOV-TV operated "at a serious competitive disadvantage with its rivals." The Commission noted that WLOV-TV had an average daily circulation of only 35,000, "significantly less than that of its VHF commercial competitors WTVA-TV (145,000) and WCBI-TV (109,100)." Although the 1997 Cable Television and Factbook reports a decline of approximately 20% for each of those stations in 1996, the corresponding figure for WLOV-TV still leaves it a woefully distant third in the market at 35,828, amounting to virtually no increase in five years. The Commission recognized, by letter of November 25, 1992 (FCC File No. BMLCT-920805KI), that the studio relocation would allow a reduction of "costs associated with rent, maintenance, utilities, local taxes and fees, and staffing." The Commission found the overall arrangement to be in the public interest and granted the application for modification of license.

This entire matter was carefully scrutinized by the Commission prior to its approving the assignment of license of WLOV-TV to LBC (See FCC File No. BALCT930831KI). While WTVA has the right under the "Program Services Agreement" to program the station, LBC, as the licensee of WLOV-TV, has elected to affiliate with Fox Broadcasting Company, whose programming accounts for a significant portion of the station's broadcast day. On average, 31.3 percent of WLOV-TV's programming derives from Fox Broadcasting Company. This figure includes two weekly half hour public affairs programs entitled *West Point of View* produced by WLOV-TV. Out of WLOV-TV's remaining weekly broadcast schedule, 68.7 percent is programmed by WTVA.

Other unique aspects of the "Program Services Agreement" set this arrangement apart from typical local marketing or time brokerage agreements. For instance, LBC may, at its sole discretion, preempt any broadcasts and use part or all of the time contracted for to cover "special news events of public importance to West Point and other communities and areas within the coverage contour of the station." LBC also retains the right to produce and broadcast two half hour programs per week to deal with issues of local interest to residents of West Point. This is in addition to any such programming produced by WTVA. Furthermore, LBC has the right to "recapture up to two (2) hours of air time per week every four (4) months, with no diminution in the compensation it is to receive." The agreement was intended to provide a situation that may someday permit WLOV-TV to achieve total independence. However, that day has not arrived, and with increased competition from cable television and DBS, together with the

future anticipated obligations and concomitant financial costs imposed by DTV, it cannot be projected at this time when, if ever, that may occur.

To the extent that the WTVA Grade B contour fully encompasses that of WLOV-TV, that situation essentially results from the fact that the stations are collocated at the WTVA transmit site. That coincidence, however, has nothing to do with the "Program Services Agreement" between the stations. Rather, it results from the decision not of LBC, or the prior licensee of WLOV-TV, but of the original licensee of WLOV-TV, when the station was known as WNSB-TV. Essentially, LBC and WTVA have accepted the situation as it has existed since the Channel 27 facilities were authorized on October 14, 1983. Indeed, television stations collocating their transmit facilities are encouraged by the Commission (See §73.635 of the Commission's Rules). Of course, it has made practical and economic sense to continue this relationship.

The cost savings inherent in the relationship are readily evident, but so too are the public interest benefits. For instance, WLOV-TV and its viewers receive full benefit of the automatic, computerized weather station operated by WTVA, including its Doppler Radar weather system. With WTVA's three meteorologists and its computerized system that can automatically broadcast weather warnings when triggered by NOAA (National Oceanic and Atmospheric Administration), WLOV-TV viewers are provided with a substantial advantage that otherwise would not be available to them. Similarly, prior to implementation of the agreement between the two stations, WLOV-TV had no local ENG (Electronic News Gathering) facilities of its own. Now it receives the advantage of the ENG facilities operated by WTVA.

The relationship between LBC and WTVA is an "arm's length" relationship that has been necessitated by market conditions. The Commission specifically gave its approval to the relationship between these two stations when it granted its consent to the assignment of license of WLOV-TV to LBC. It did so with full knowledge of the technical parameters of the stations and the fact that a programming agreement would be employed to provide cost savings and efficiencies necessary to promote the financial viability of WLOV-TV. Without benefit of the "Program Services Agreement," WLOV-TV would have gone dark several years ago.

At this point in time, its continuance is essential for the survival of the station. The economies of scale and operating efficiencies that result from the arrangement facilitate the existence of this UHF station as another voice in the local marketplace. It is essential to the continued viability of WLOV-TV that it is permitted to continue under its present "Program Services Agreement" with WTVA. While WLOV-TV's financial prospects showed slight improvement for the calendar year ended December 1996, its balance sheet still reflects substantial negative retained earnings and a ratio of total current liabilities to total current assets of nearly nine to one!

The acquisition of WLOV-TV by LBC was approved by the Commission with full disclosure of the circumstances and the existence of the "Programming Services Agreement." Only on the basis of the existence of the "Program Services Agreement" would LBC have sought

to acquire WLOV-TV. Indeed, not only did LBC borrow a substantial sum of money to acquire WLOV-TV, but LBC's sole shareholder, John R Lingard, as well as his wife, were each required to sign a personal guaranty with respect to the amount borrowed. Should the Commission adopt rules that would prohibit or limit arrangements such as exist between LBC and WTVA, Inc., it should "grandfather" any such existing relationships. To do otherwise would, in this case, work an extreme financial hardship on LBC and Mr. and Mrs. Lingard, not to mention the deprivation of service that likely would result to the viewers of WLOV-TV, to the ultimate detriment of the public interest.

Wausau, WI

DMA Market No. 135

WAOW-TV, Ch. 9 (ABC primary/FOX)

WYOW-TV, Ch. 34 (ABC primary/FOX)

The subject TBA between Shockley and Northwoods was executed on May 9, 1996, at which time the initial construction permit application for WYOW was pending (File No. BPCT-950912KE). That application was granted on September 30, 1996, and, in early January 1997, WYOW commenced program tests. Northwoods subsequently filed a license application for the station (File No. BLCT970115KE), which is currently pending.

Station WYOW is located in the remote Northwoods area of northern Wisconsin and is one of the only two full service TV stations serving the region. Thus, the TBA between Shockley, an established broadcaster in the market, and Northwoods has facilitated marketing; the provision of high-quality and essential programming to the Eagle River area, like critical and emergency weather information; *Wisconsin Newslink*, including pertinent news and other stories from across the state; and local Eagle River and network coverage. In addition, Shockley recently obtained FCC authority to construct and operate two microwave relay facilities between WAOW-TV and WYOW, which will enhance the provision of programming to WYOW, pursuant to the TBA, and permit the provision of additional programming uniquely geared to Eagle River viewers. Thus, the subject TBA serves important public interest considerations.

Erie, PA

DMA Market No. 143

WICU-TV, Ch. 12 (NBC)
WFXP-TV, Ch. 66 (Fox)

The LMA has allowed WFXP-TV to provide the viewers of Erie with a new local nightly newscast. On May 27, 1997, under SJL's stewardship, WFXP began to air a local nightly newscast from 10:00 p.m. to 10:30 p.m. Prior to the LMA, WFXP had no newscast or *even plans* for such a newscast. Indeed, with an operating profit of only \$258,702 in 1996, the cost of even a bare bones newscast would have been too great for the station to bear. However, with the efficiencies realized through the combined operation of WFXP and WICU, SJL has been able to create a full, local newscast by hiring a dedicated full time anchor and producer for the WFXP newscast, each of whom are assisted by the resources of the WICU news team. Without the part time devotion of more than 20 reporters, writers, editors and photographers and WICU's million dollar news budget (made available only through the LMA) WFXP simply could not, and would not be providing Erie with this additional news service.

The LMA has also allowed SJL to make technical improvements to WFXP for the benefit of viewers, advertisers, and public service campaigns. For example, prior to the LMA, the station was operating on a shoestring budget with low paid personnel operating a manual master control system that led to poor video quality and many on-air mistakes, such as missed commercials. Since SJL entered into the LMA, it has invested nearly \$750,000 in new equipment that will allow both WICU and WFXP to provide its viewers with better picture quality and its advertisers with more prompt and accurate service. SJL has also been renovating the WICU-TV building in order to collocate the staffs of both stations, which SJL believes will allow it to realize even greater efficiencies and enable it to continue to improve the services of both WICU and WFXP to viewers and advertisers.